

Statement of Work

~~TECHNICAL SUPPORT FOR UPPER ANIMAS RIVER WATERSHED FOR REMEDIAL INVESTIGATION/FEASIBILITY STUDY ACTIVITIES~~

Interagency Agreement with the U.S. Army Corps of Engineers

AUTHORITY

This interagency agreement (IA) is entered with the USACE under the statutory authorities vested in the President of the United States and delegated to EPA under CERCLA (PL 96-510) and SARA (PL 99-499) and Executive Order 12580, as amended.

PURPOSE

EPA Region 8 requires technical support and expertise necessary to conduct EPA-lead ~~remedial investigation/feasibility studies (RI/FS)~~ activities and oversee potentially responsible parties (PRP) ~~RI/FS~~ activities at the Upper Animas Superfund Site. Both the EPA-lead and PRP oversight activities will be conducted by USACE resources, ~~both the government FTEs and their contractors.~~

SITE BACKGROUND

The Upper Animas Mining District Site is located in the Upper Animas river watershed above and around the Town of Silverton, San Juan County, Colorado. The Site is a large mining site that covers approximately 146 square miles where active mining occurred from 1871 to 1991. There are over 300 known mines in the watershed.

The UA river watershed has been studied extensively during the last 20+ years by a number of organizations and governmental entities including state and federal agencies as well as local environmental groups and responsible parties. Monitoring data collected by the various entities includes high quality data that will meet EPA's data quality requirements as well as an extensive body of data of a lesser quality that is still considered to be useful.

EPA committed in the 1990's to not pursue a National Priority List (NPL) designation for the Upper Animas River, as long as the community based collaborative approach was making progress as demonstrated by water quality improvements in the Animas River. Despite the combined efforts of the Animas River Stakeholder Group (ARSG), BLM, the State and other stakeholders to address the water quality in the UA, sampling results in the Animas River since 2004 have shown an overall decline in water quality. As a result of this water quality trend, EPA considered several approaches and chose to prepare a targeted NPL designation for the Upper Cement Creek area. As EPA was finalizing a package for this proposed targeted listing in 2011, Sunnyside Gold Corporation (SGC), the local government, and ARSG vigorously opposed this proposal, and EPA agreed not to pursue this effort at that time.

EPA now believes that an NPL designation is necessary to address the deteriorating water quality conditions in the watershed. Consequently, EPA has re-directed its focus in the community towards changing the perspective about an NPL designation although the Site has not been nominated to the NPL.

EPA has conducted extensive water quality sampling in the Cement Creek and Lower Animas watershed during the last 3-4 years. Sampling has included water quality, sediment, flow, benthic organisms, fish inventory & tissue. In Spring, 2015, EPA will be releasing a draft Baseline Ecological Risk Assessment (BERA) on Cement Creek and the Lower Animas River. EPA and BLM are planning additional sampling on the Upper Animas River watershed above Silverton to the headwaters to characterize that portion of the watershed. EPA expects that additional sampling and remedial investigation work will be necessary in 2016 and 2017.

SCOPE OF SERVICES

This IA can be used to obtain the following services:

A. Field Work and Analytical Support

- a. Provide resources necessary to conduct field investigation activities. This activity may include site reconnaissance, environmental sample collection, document review, and proper disposal of investigation-derived wastes.
- b. Coordinate with EPA on the selection of analytical services,
- c. Provide appropriate data validation services.
- d. Provide data management support services (including technical deliverables) that address the collection, processing, management, distribution, analysis and archival of data and information. The USACE will coordinate with EPA to ensure data is delivered in a format that complies with EPA's requirements.
- e. Develop or update the site conceptual site model.

B. Remedial Investigation/Feasibility Study (RI/FS)

- a. Conduct a preliminary review and identification of Federal/State Chemical and Location Specific Applicable Relevant and Appropriate Requirements (ARARs).
- b. Assist EPA with the conduct of human health and ecological risk assessment activities to determine whether site contaminants pose an actual or potential future risk to human health and the environment in the absence of any remedial action. EPA Region 8 has risk assessment contractors to prepare the risk assessments.
- c. Conduct a feasibility study to develop, screen, and evaluate cleanup alternatives that ensure the protection of human health and the environment and meet ARARs.
- d. Conduct laboratory bench-scale, pilot scale or field-scale treatability studies to fully develop and analyze remedial alternatives.
- e. Develop and deliver draft(s) and final remedial investigation and feasibility study reports and addenda.

C. Oversight or Oversight Support

- a. Review implementation of work plans, sampling and analytical plans (SAP)/Quality assurance project plans (QAPPs) in the field.

- b. Observe sampling activities for compliance with settlement documents, and approved SAPs/QAPPs.
- c. Maintain a log of detailed observations at the site, including interactions with all parties, results of field tests and inspections, and observations about conformance with the project-specific plans and deviations from the approved plans.
- d. Review and provide comments to EPA on the adequacy of PRP deliverables (plans, reports, data packages, etc.)
- e. Prepare technical field oversight reports, which may include period reports and a final summary reports.
- f. Support EPA in the oversight of the treatability study activities conducted by PRPs including the review of the treatability study work plan and QAPP, overseeing treatability study activities, and review the draft and final treatability study report.
- g. Support EPA in the oversight of RI/FS activities conducted by PRPs including but not limited to reviewing the RI or FS report, investigating remedial alternatives, and providing risk assessment support.

D. General Technical Support

- a. Provide support to EPA in the preparation of the Proposed Plan and the Record of Decision;
- b. Attend public meetings, briefings, public hearings.
- c. Attend technical meetings with PRPs.
- d. Prepare presentation materials or ad-hoc technical deliverables.

WORK ACTIVATION/AUTHORIZATION PROCESS

The generic (bulk funded) IAG will be executed between the EPA's OSRTI and the USACE Environmental & Munitions Center of Expertise (EM CX). EM CX will retain the bulk funding for the IAG, but does not have authority to obligate or expend any funds until EPA issues a task specific Work Authorization Form (WAF). The EPA project officer (PO) has the authority to execute a work authorization to USACE for activities within the scope of work of the generic IA. The EPA PO will use a WAF to describe, define, authorize, and activate the assignments. The WAF may indicate which USACE office is being requested to perform the assignment. The WAF will be submitted to the USACE EM CX for administrative and financial processing. The WAF will be assigned to the USACE performing district. The USACE performing district will ensure that all provisions of the scope of work are met and that funds expended are consistent with the WAF.